

## **EXHIBIT 203**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED STATES  
VIRGIN ISLANDS,

Plaintiff,

v,

No. 22-cv-10904-JSR

JPMORGAN BANK, N.A.,

Defendant.

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JPMORGAN CHASE BANK, N.A.,  
Third-Party Plaintiff

v.

JAMES EDWARD STALEY,  
Third-Party Defendant.

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THE ORAL DEPOSITION OF ALBERT BRYAN, JR. was  
taken on the 6th day of June, 2023, at the Law Offices  
of Joel Holt, 2132 Company Street, Christiansted, St.  
Croix, U.S. Virgin Islands, between the hours of 8:42  
a.m. and 3:47 p.m. pursuant to Notice and Federal Rules  
of Civil Procedure.

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Reported by:

DESIREE D. HILL  
Registered Merit Reporter  
Hill's Reporting Services  
P.O. Box 307501  
St. Thomas, Virgin Islands  
(340) 777-6466

1 running in this election?

2 A. Six.

3 Q. Okay.

4 A. At least I think. Don't quote me. I'm  
5 guessing.

6 Q. Was that a normal number or was this a  
7 particularly crowded field?

8 A. Lately it's been pretty crowded.

9 Q. And then Epstein reports that you won.  
10 And Farkas writes back, Know him?  
11 Mr. Epstein writes, Very, Very.

12 You see that?

13 A. Eh-hmm.

14 Q. You have any idea why he was describing  
15 your relationship that way other than what we've  
16 already discussed?

17 MR. ACKERMAN: Objection  
18 speculation.

19 THE WITNESS: No, sir.

20 Q. (By Mr. Neiman:) Do you recall talking to  
21 Mrs. de Jongh in or around this time period when you  
22 were elected and when you began serving in office  
23 about the topic of donations that Mr. Epstein's  
24 company might make?

25 A. Yeah.

1           Q.     Take a look at some of those indications.  
2     Take a look first at Exhibit 8, which we'll mark as  
3     Exhibit 20.

4           MR. ACKERMAN: I got it as 19.

5           MR. NEIMAN: Well, let's make it  
6     19, then.

7           (Deposition Exhibit No. 19 was  
8           marked for identification.)

9           Q.     All right. I'm showing you Exhibit 19  
10    which is a short exchange between Mrs. de Jongh and  
11    you copied to Richard Kahn. Do you see that?

12          A.     Between Mrs. de Jongh and me?

13          Q.     No. Between Mrs. de Jongh and Mr. Epstein  
14    copied to Richard Kahn.

15          A.     Correct. Yeah.

16          Q.     So Richard Kahn there, you could see the  
17    name spelled out full. Was that someone that  
18    contributed to any of your campaigns?

19          A.     I don't know Richard Kahn, sir.

20          Q.     You don't know one way or the other whether  
21    they contributed to your campaigns?

22          A.     No, I don't.

23          Q.     And Mrs. de Jongh is saying to Mr. Epstein  
24    that she spoke to Albert. That reference to you?

25          A.     Right.

1 Q. And he will let us know where he thinks  
2 STC's giving would be most impactful. He said, "Thank  
3 You." You see that?

4 A. Yes.

5 Q. Do you recall this discussion with de Jongh  
6 about where the giving would be most impactful?

7 A. Yes.

8 Q. How did you go about thinking about where  
9 the giving would be most impactful?

10 A. Well, I mean, people -- normally  
11 non-profits usually contact government, like I said.  
12 But I mean, when you're running an election, you  
13 speak to everybody. I mean, it's only 11,000 votes,  
14 you could shake 11,000 hands. But I have -- the  
15 autism project is very near and dear to me. Of  
16 course Junior Achievement. I know places that were  
17 hit hard.

18 You know, one of my things, Little  
19 League. I always thought -- you know, when I played  
20 Little League, we always had uniforms and really -- I  
21 mean, looked professional. And you know, the kids  
22 play in t-shirts now. I mean, I just think they just  
23 get a better feeling when they go out there.

24 Q. Okay. And Junior Achievement was the place  
25 you had worked before you became governor?

1 A. Yes.

2 Q. And so one of the things that you did when  
3 Mrs. de Jongh asked you, you know, where STC's giving  
4 would be most impactful, you said junior achievement?

5 A. Yes.

6 Q. You believed in the organization?

7 A. Yeah. I worked for \$40,000 a year. You  
8 know, I didn't do it for the money. I did it  
9 because, you know, I really believed that kids need  
10 financial literacy.

11 Q. So, that was one of the things that you  
12 recommended?

13 A. Yes.

14 Q. So Mrs. de Jongh knew that was an issue  
15 that is personally important to you?

16 A. I'm am sure she did. She knows I was  
17 essentially volunteering to be there.

18 Q. So by giving to Junior Achievement,  
19 Mr. Epstein would be making contribution, then, would  
20 not only help the island but would be something that  
21 would be appreciated by you personally, right?

22 MR. ACKERMAN: Objection to form.

23 THE WITNESS: All contributions to  
24 our charities are appreciated by me  
25 personally.

1 Q. (By Ms. Neiman:) But this is a charity  
2 that you particularly invested in, right?

3 A. If you're asking if it bought favor  
4 because he invested in Junior Achievement? Not  
5 particularly.

6 Q. I didn't ask you that. I asked you --

7 A. I felt like I was helping them out more  
8 than they were helping me out.

9 Q. Sure. But you were helping them out by  
10 suggesting that they contribute to a charity that you  
11 were quite close to, right?

12 A. Right. I think in the documents I was  
13 shown, though, I said it would be self-serving for me  
14 to recommend Junior Achievement. So I didn't want to  
15 do that, you know. Because, I mean, those are my  
16 people.

17 Q. But then you actually suggest Junior  
18 Achievement?

19 A. Yeah, but I said it will be self-serving  
20 for me to do so.

21 Q. So you suggested that it will be  
22 self-serving?

23 A. Yeah.

24 Q. And then they decided to give to Junior  
25 Achievement, right?

1 A. I don't know.

2 Q. Fair enough. All right. Let's take a look  
3 at -- well, this time I'm showing you Exhibit 20.  
4 This is another email exchange to Mrs. de Jongh and  
5 Epstein in December of 2018. Between the time when  
6 you were elected and began to serve as Governor,  
7 correct?

8 (Deposition Exhibit No. 20 was  
9 marked for identification.)

10 A. Eh-hmm.

11 Q. It's a tough one for the court reporter.

12 A. Yes.

13 MR. ACKERMAN: Objection to form.

14 The last question, I think there were  
15 two questions in there.

16 MR. NEIMAN: Okay.

17 Q. (By Mr. Neiman:) Now, if you look at the  
18 bottom of the page, you could see that Mrs. de Jongh  
19 writes, Good afternoon Jeffrey, Albert suggested a  
20 school for autistic children and Junior Achievement.  
21 Do you see that?

22 A. Yes.

23 Q. Autism is another issue that's personally  
24 important to you?

25 A. Yes.



1 on each islands, three balls, three inaugurations,  
2 three church services.

3 Q. So that adds up.

4 A. Yes, it does.

5 Q. So your campaign went out solicited  
6 donations from people? Yes?

7 A. Yes.

8 Q. And one of the people that you raised money  
9 from was Mr. Epstein, correct?

10 A. Not to my knowledge.

11 Q. All right. Let's take a look. This is  
12 document marked as Exhibit 23. You see this is an  
13 email on December 20th from Mrs. de Jongh to Mr.  
14 Epstein. The subject is Inaugural Committee. You see  
15 that?

16 (Deposition Exhibit No. 23 was  
17 marked for identification.)

18 A. Correct.

19 Q. And Ms. De Jongh is reporting she got a  
20 call from Bryan/Roach inaugural committee, and they  
21 asked for a \$25,000 donation to the inaugural event?  
22 You see that?

23 A. You asked me if my campaign raised any  
24 money. This is not my campaign. This is the  
25 inaugural committee.

1           Q.     Will you agree that you described your  
2     campaign as going out and raising money for your  
3     inauguration?

4           A.     No, I just want -- when I'm reading this,  
5     I'm just saying what this document says.

6           Q.     When you talked before, was there also fund  
7     raising going on by your campaign for the  
8     inauguration?

9           A.     The inaugural committee.

10          Q.     Not the campaign?

11          A.     I'm not sure. I mean, remember this is  
12     the island. Like, this is the same people. So I  
13     can't say they were in the capacity of the campaign  
14     or -- we don't have any recorded -- I don't think we  
15     recorded any donations to the election roll for the  
16     inaugural committee from the campaigns. So if the  
17     inaugural committee was raising money, they were  
18     doing it under that guise -- not the campaign was  
19     done.

20          Q.     Same people, different entity doing the  
21     raising.

22          A.     Sort of the same people. We had a lot  
23     more people in the inaugural committee.

24          Q.     Sure. Once you won, everybody wants to be  
25     a part of --

1 MR. ACKERMAN: Objection.

2 THE WITNESS: Absolutely.

3 Q. (By Mr. Neiman:) And what it says here  
4 about how you were trying to raise the money privately  
5 for inaugural events, that's inaccurate?

6 MR. ACKERMAN: Objection to form.

7 THE WITNESS: Yeah. I wasn't  
8 trying to raise any money. The  
9 inaugural committee was.

10 Q. (By Mr. Neiman:) Well, did you tell them  
11 don't do this?

12 MR. ACKERMAN: Objection to form.

13 THE WITNESS: No.

14 Q. (By Mr. Neiman:) You could have told them  
15 not to do it, right?

16 MR. ACKERMAN: Objection to form.

17 THE WITNESS: Yeah, I could have  
18 told them not to do it. I think the  
19 whole inaugural activity thing is a  
20 waste of money anyway. So I didn't  
21 really have any involvement in it.

22 Q. (By Mr. Neiman:) Well, you went to the  
23 events?

24 A. I didn't have a choice.

25 Q. I mean, you could have told them I don't

1 want to raise money for this, right?

2 MR. ACKERMAN: Objection.

3 THE WITNESS: I didn't raise any  
4 money for it.

5 Q. (By Mr. Neiman:) There was no -- the  
6 inaugural committee didn't raise any money?

7 A. I didn't raise any money for it.

8 MR. ACKERMAN: Objection to form.

9 Q. (By Mr. Neiman:) You could have told them  
10 you didn't want them to raise any monies for these  
11 events, right?

12 A. I guess.

13 Q. But you didn't?

14 A. No, I didn't do that.

15 Q. They understood this is something that you  
16 wanted them to do.

17 A. No, no, no.

18 MR. ACKERMAN: Objection to form.

19 THE WITNESS: They understood that  
20 this was something traditional that they  
21 do. I mean, we just had another one. I  
22 didn't think that we should have done  
23 that either but I respect the wishes of  
24 the people and what comes with the  
25 office.

1 Q. (By Mr. Neiman:) Okay. You certainly  
2 didn't do anything to discourage the inaugural  
3 committee from raising money, did you?

4 MR. ACKERMAN: Objection to form.

5 THE WITNESS: No.

6 Q. (By Mr. Neiman:) And here they're asking  
7 for Mr. Epstein to make a contribution. Do you know  
8 whether he did or not?

9 A. No, I don't.

10 Q. What kind of records were kept of who had  
11 contributed to the inaugural committee?

12 MR. ACKERMAN: Objection to form.

13 Foundation.

14 THE WITNESS: I don't know.

15 Q. (By Mr. Neiman:) No idea one way or the  
16 other?

17 A. No. I mean, you have to remember we had a  
18 runoff election. So by the time I realized that I  
19 was going to be governor was almost December. We  
20 didn't have -- we were taking over the government on,  
21 like, January 7th. We had people to vet for cabinet  
22 membership. And, you know, my focus at this time was  
23 not party. So it was trying to make sure that I was  
24 prepared to take over the government.

25 Q. Sure. And one of the things you had to do